

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION**

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CONVERGEN ENERGY WI LLC and THEODORE HANSEN,

Plaintiffs,

-against-

CONVERGEN ENERGY LLC, L'ANSE WARDEN ELECTRIC COMPANY, LLC, and LIBRA CAPITAL US, INC.,

Defendants.

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Index No.

**Brown County Circuit Court,  
Wisconsin, Case No. 2020-CV-000495**

**DECLARATION OF MICHAEL STOLPER**

I, Michael Stolper, declare:

1. My name is Michael Stolper and I am an attorney with the Seiden Law Group LLP. I am licensed to practice in the State of New York, and I submit this declaration in support of the Notice of Removal. If I were asked to testify, I would testify consistent with this declaration, and I have personal knowledge of all facts set forth herein.

2. I am counsel to Defendants Convergen Energy LLC ("CE"), L'Anse Warden Electric Company, LLC ("Lanse"), and Libra Capital US, Inc. ("Libra").

3. Libra is a Delaware Corporation with a principal place of business in New York.

4. Lanse is a Delaware limited liability company and wholly owned subsidiary of CE.

5. CE is a Delaware limited liability company and wholly owned subsidiary of Convergen Energy Holdings LLC, a Delaware limited liability company.

6. Convergen Energy Holdings LLC is a wholly owned subsidiary of First North American Holdings II, Inc., a Delaware corporation.

7. Upon information and belief, CE-Wisconsin and Niantic are not citizens of Delaware or New York.

8. I have requested Plaintiffs' counsel Benjamin LaFrombois to identity the members of Convergen Energy WI, LLC and NianticVista Energy, LLC but have not received an answer.

Dated this 2<sup>nd</sup> day of June, 2020.

*Electronically signed by Michael Stolper*  
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Michael Stolper